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March 31, 2020

**By PACER**

Hon. Tonianne J. Bongiovanni, U.S.M.J.  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: Future Sanitation, Inc. v. Evergreen National Indem. Co. & Martin Sternberg  
District of New Jersey Case No. 3:17cv03471-MAS-TJB**

Dear Judge Bongiovanni,

We are counsel for Plaintiff and are writing to request thirty (30) day an adjournment of the motion for summary judgment [DE68] from the current return date of 4/6/2020 [DE72].

We filed our notice of appearance on March 4, 2020 [DE71]. The challenges of moving my children back home from college and apartments, while gearing up staff and clients to work remotely due to the local, State and National movement restrictions and emergency orders requires additional time to review, advise our client and make any appropriate filing in response to the pending motion.

We appreciate any courtesies and considerations that can be provided and hope all are safe and healthy during this challenging time.

Respectfully Submitted,

*Keith A. McKenna*

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Keith A. McKenna, Esq.

KAM/JD

Cc: All Counsel of Record (By PACER and Email)